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2 BARBARA HART (*pro hac vice*)
3 DAVID C. HARRISON (*pro hac vice*)
4 LOWEY DANNENBERG COHEN & HART, P.C.
5 One North Broadway, Suite 509
6 White Plains, NY 10601-2310
7 Telephone: 914-997-0500
8 Facsimile: 914-997-0035

9 *Lead Counsel for the New York City Pension Funds and the Putative Class*

10 WILLEM F. JONCKHEER S.B.N. 178748
11 SCHUBERT JONCKHEER KOLBE & KRALOWEC LLP
12 Three Embarcadero Center, Suite 1650
13 San Francisco, CA 94111
14 Telephone: 415-788-4220
15 Facsimile: 415-778-0160

16 *Local Counsel*

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN JOSE DIVISION
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IN RE JUNIPER NETWORKS, INC.
SECURITIES LITIGATION

No. C 06-04327-JW

**DECLARATION OF CAROLYN WOLPERT
IN SUPPORT OF LEAD PLAINTIFF'S
MOTION FOR CLASS CERTIFICATION**

DATE: June 29, 2009
TIME: 9:00 a.m.
BEFORE: Hon. James Ware

1 CAROLYN WOLPERT hereby declares, pursuant to 28 U.S.C. § 1746:

2 1. I am an Assistant Corporation Counsel and Deputy Chief of the Pensions Division in the
3 Office of the Corporation Counsel of the City of New York ("Law Department").

4 2. I submit this declaration in support of the motion by the New York City Pension Funds
5 ("Lead Plaintiff" or "the NYC Funds") for certification of this Action as a Class Action pursuant
6 to Rule 23 of the Federal Rules of Civil Procedure for the Class Period July 11, 2003 through
7 August 10, 2006; appointment of Lead Plaintiff as the Class Representative; and appointment of
8 Lowey Dannenberg Cohen & Hart, P.C. as class counsel.
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10 3. I previously submitted a declaration with this Court on September 15, 2006 in support of
11 the NYC Funds' application for appointment as Lead Plaintiff. In my declaration I described the
12 NYC Funds' qualifications to serve as Lead Plaintiff and set forth the significant losses sustained
13 by the NYC Funds in its investment in Juniper securities during the Class Period, establishing the
14 NYC Funds as the member of the class with the largest financial interest in the outcome of this
15 litigation.
16

17 4. On November 20, 2006, the Court appointed the NYC Funds Lead Plaintiff given that the
18 NYC Funds had the largest financial interest in the case and was the member of the class most
19 capable of adequately representing the interest of the class members. *See* D.K. No. 64.

20 5. The Law Department is the legal arm of the City of New York. Pursuant to the powers
21 and duties granted to it under Section 394 of the New York City Charter, the Law Department
22 represents all City agencies, Lead Plaintiff, as well as the offices of elected officials such as the
23 Comptroller and the Public Advocate. In the matters in which outside counsel is retained to
24 represent New York City, its agencies and its pension funds, the Law Department has the
25 authority and responsibility to select which firms to retain and to negotiate the terms of retention.
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1 6. The Law Department has over 650 attorneys with experience in many areas of litigation,
2 including class action and securities litigation, at both the trial and appellate levels. The Law
3 Department's expertise extends to the areas of bankruptcy, financial transactions and other
4 related fields. Since 1992, the Law Department has worked on a number of cases involving
5 securities law, both in private securities fraud class action litigation and in cases involving the
6 issue of whether companies were required to include the Lead Plaintiff's shareholder proposals
7 in their proxy materials.
8

9 7. Lead Plaintiff is familiar with the claims at issue in this Action and understands its duties
10 as the Class Representative.

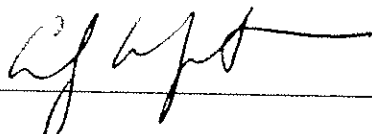
11 8. In fulfillment of its duties, the NYC Funds have selected the firm of Lowey Dannenberg
12 Cohen & Hart, P.C. ("Lowey Dannenberg") to serve as Lead Counsel. Lowey Dannenberg is an
13 experienced and highly regarded securities litigation firm, and has been pre-qualified to represent
14 the Lead Plaintiff in securities litigation after a merits selection process.
15

16 9. Pursuant to its agreement with Lowey Dannenberg, Lead Plaintiff has received, reviewed,
17 and approved all significant pleadings (*e.g.*, consolidated complaint, opposition to the motions to
18 dismiss, and this class certification motion) before they were filed with the Court. Lead Plaintiff
19 has been kept abreast of court appearances, the discovery schedule and progress, and all other
20 important parts of the litigation. Lead Plaintiff has also received and reviewed, on a periodic
21 basis, time and expense reports of Lowey Dannenberg. In addition, Lead Plaintiff has produced
22 documents, answered requests for admission and interrogatories, and in due course is prepared to
23 give deposition testimony.
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25 10. Should this Court certify this Action a class action and appoint Lead Plaintiff as Class
26 Representative, the NYC Funds will continue to actively monitor this Action and fulfill its duties
27 as Class Representative.
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1 I declare, under penalty of perjury, that the foregoing is true and correct.

2 Executed this 2nd day of March 2009

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5 _____
6 CAROLYN WOLPERT